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	:	UNITED STATES BANKRUPTCY COURT
In re:	:	FOR THE DISTRICT OF NEW JERSEY
	:	
Judith Linton	:	Honorable Christine M. Gravelle
	:	
	:	Case No: 18-27247
Debtor,	:	
	:	Hearing Date: 9/19/2018 @9am

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**CERTIFICATION IN OPPOSITION TO MORTGAGE COMPANY'S OBJECTION**

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To: **HONORABLE Christine M. Gravelle**  
United States Bankruptcy Court  
402 E. State Street  
Trenton, New Jersey 08608

Albert Russo  
Chapter 13 Standing Trustee  
1 AAA Drive  
Robbinsville, NJ 08691  
VIA CM/ECF

I Leonard R. Boyer, Esq., of Boyer Coffy, LLC., hereby, certify as follows:

Debtor, Judith Linton, did file bankruptcy as stated by secured creditor's attorney, however, there is an explanation to all this.

Our firm hired an attorney and a paralegal to handle these matters, as I had extensive medical issues, I was unable to oversee the everyday matters of the office.

On the case filed on September 5, 2017, my firm and debtor did everything we were required to do. I went to Bankruptcy Court on June 20, 2018, for an Order

Granting Case to be Reinstated and also Confirmation date was adjourned until August 1, 2018, at which time it would be "honor roll" confirmation according to staff attorney from Albert Russo, Chapter 13 Standing Trustee.

This case was worked out with Albert Russo, Chapter 13 Standing Trustee and put on the record by David Martin, Esq, staff attorney for the Standing Trustee, to be confirmed at 100% plan on the "Honor Role".

However, staff attorney David Martin, Esq, from Mr. Russo's office went on vacation and never actually made a note for the file as to the conversation with me, and on August 1, 2018 it was dismissed in error.

I immediately contacted Mr. Erik Collazo, Esq. Staff Attorney, from Mr. Russo's office who informed me of the above and said I would need to do another motion or refile case.

Since a Sheriff Sale, was scheduled, I decided to re-file case.

All necessary documents were sent to trustee, my client Judith Linton, was up-to-date on payments to Trustee and all mortgages.

I oppose the mortgage company objection to continue with this case, as this case if was not for a human error by trustee's office it would of have been confirmed at confirmation hearing on August 1, 2018.

Debtor will suffer irreparable harm if secured creditor's objection is granted, I pray that the Court will allow my client to continue with her bankruptcy.

/s/ Leonard R. Boyer, Esq.  
LEONARD R. BOYER, ESQ.

Dated: September 12, 2018